

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

United States of America,

Case No. 25-CR-00006-LKG

v.

THOMAS C. GOLDSTEIN,

Defendant.

**NON-PARTY JOHN DOE 2'S MOTION TO SEAL HIS REPLY TO
THE GOVERNMENT'S RESPONSE IN OPPOSITION TO HIS MOTIONS**

Non-party John Doe 2 ("JD2"), through undersigned counsel, respectfully requests this Court to order that his Reply to the United States of America's (the "Government's") Response to JD2's Motions to Quash the Government's subpoena (ECF No. 294) and to Proceed Under a Pseudonym (ECF No. 291), be placed under seal. JD2 is filing simultaneously a redacted, public version of his Reply.

JD2 is a non-party to this action and remains unnamed in the Second Superseding Indictment. JD2's Reply contains sensitive personal information and information identifying him as an unnamed person in the Second Superseding Indictment, which also contains sensitive personal information that could be attributed to him.

Accordingly, pursuant to Local Rule 207.2, JD2 respectfully requests the Court to approve the filing of his Motion to Quash the Government's Subpoena under seal.

Dated: January 7, 2026

Respectfully submitted,

/s/ Elizabeth Hughes

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CERTIFICATE OF SERVICE

I certify on January 7, 2026, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system and served electronically upon all counsel of record.

/s/ Elizabeth Hughes, Esq.